

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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| In the Matter of |) | |
| |) | |
| Structure and Practices of the Video Relay |) | CG Docket No. 10-51 |
| Service Program; Telecommunications Relay |) | |
| Services and Speech-to-Speech Services for |) | |
| Individuals with Hearing and Speech Disabilities |) | CG Docket No. 03-123 |
| |) | |
| To: The Commission |) | |

JOINDER AND SUPPORT OF PETITION FOR INTERIM WAIVER

Purple Communications, Inc., hereby joins and support the petition filed on July 25, 2012 (the “Original Petition”) by Hamilton Relay, Inc. and Sprint Communications Company, L.P. (collectively called “Original Petitioners”) for an interim waiver of the requirements in Sections 64.604(c)(5)(iii)(C)(2)(v) and 64.604(c)(5)(iii)(C)(2)(vi) of the Commission's rules, in connection with the provision of Internet Protocol Captioned Telephone Service ("IP CTS").

The Original Petition asked for an interim waiver of the requirement to provide an incoming telephone number in Call Detail Records (CDRs) for calls originating from IP-based captioned telephone devices. In such cases, due to technical reasons, Original Petitioners would only be able to report the IP address and dialed number in their CDRs for calls originating from IP CTS devices. Purple shares similar concerns and agrees that IP CTS providers are technically incapable of complying with the current rules, which appear to require IP CTS providers to provide an incoming telephone number in their CDRs.

In footnote 4 of the Original Petition, Original Petitioners requested that the interim waiver be applied to all similar situated IP CTS providers. Purple concurs with this request and emphasizes that any waiver should be inclusive of all IP CTS services, not merely those provided by Original Petitioners or referenced in the Original Petition.

Like the Original Petitioners, Purple looks forward to continuing its work with Commission staff to develop best practices that are of similar scope to the rules applicable to other forms of Internet based relay services, but which recognize the unique aspects of IP CTS, including its reliance on the existing telephone numbers of users. Purple has previously urged Commission staff to diligently pursue the development of tailored regulations for this service platform, given its rapid growth and the current lack of adequate rules.

Respectfully submitted,

PURPLE COMMUNICATIONS, INC.

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August 17, 2012